

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:  
Erin M. Kocotis

Debtor

HSBC Bank USA, N.A.

Defendant

v.

Erin M. Kocotis

Plaintiff

Chapter 13

Bankruptcy no. 17-16362-MDC

Adversary No. 17-00297-MDC

Related to Document No. 1

**ANSWER OF HSBC BANK USA, N.A. TO DEBTOR'S COMPLAINT TO DETERMINE  
SECURED STATUS OF 2<sup>ND</sup> MORTGAGE**

Defendant, HSBC Bank, USA, N.A, (hereinafter "Defendant"), by and through its attorney Celine DerKrikorian, Esquire, and McCabe, Weisberg & Conway, P.C., hereby responds to Plaintiff's Complaint as follows:

1. Admitted.
2. Admitted in part, denied in part. It is admitted that Plaintiff owns her residence at 4221 Fairdale Road, Philadelphia, PA and it is also admitted that attached as Exhibit "A" is appraisal. The remaining allegations of this paragraph of Plaintiff's Complaint are denied as a conclusion of law to which no response is required.
3. Admitted in part, denied in part. It is admitted that there is a senior lien on the Property, the remaining allegations of this paragraph of Plaintiff's Complaint are denied as a conclusion of law to which no response is required.
4. Denied. The allegation of this paragraph of Plaintiff's Complaint is denied as a conclusion of law to which no response is required. By way of further response, Defendant reserves its right to obtain its own appraisal with regards to the Property.

5. Denied. The allegation of this paragraph of Plaintiff's Complaint is denied as Defendant is without sufficient information is without sufficient knowledge to form a belief or opinion with regards to the status of the third mortgage, and accordingly must deny the same.

WHEREFORE, the Defendant, HSBC Bank, N.A. respectfully request this Honorable Court enter an Order dismissing the Adversary Complaint, and for such other and additional relief as is just.

Dated: November 3, 2017

/s/ Celine DerKrikorian

ANN E. SWARTZ, ESQUIRE, I.D. # 201926

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